



PROJECT : The Bull, Gosmore

DOCUMENT : Built Heritage Statement Rev A

CLIENT : James Beare



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Introduction



Ward-Booth Partnership



ARCHITECTURE

We combine deep knowledge of historic buildings with a clear understanding of the needs of modern living to create hand crafted designs which blend modern technology with traditional building techniques. Every project is individually designed and we work alongside our clients to create unique and beautiful buildings.



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Working with cutting edge technology we build survey grade digital models of historic buildings and work with highly skilled craftsmen to repair and conserve these buildings for future generations. Working with the owners of listed buildings we help them to achieve improvements and ensure the best balance between conservation and the requirements of modern living.

HERITAGE SUPPORT

Using our knowledge of historic buildings and the planning system we provide heritage statements and built heritage advice to support the work of architects, developers, private clients and planning consultants.





chance of obtaining Planning Permission and Listed Building Consent.

He has served on the St Albans Diocesan Advisory Committee, is an RIBA prize winner and has designed and obtained planning permission for a PPG7 Country House.

ROBERT WARD-BOOTH - CV

Bsc (Hons) Building Surveying, MRICS, DipBldgCon, IHBC

Robert holds a BSc (Hons) degree in Building Surveying an RICS Diploma in Building Conservation and is a member of both the RICS and IHBC.

He has over 25 years experience in the planning, design and development sectors and previously worked as a Conservation Officer. Since 1998 Robert has undertaken a range of design, conservation and development work for private owners, private estates, private developers and public authorities. In this capacity he has acted for South Bedfordshire District Council, Bedfordshire County Council, Luton Borough Council and Central Bedfordshire Council and provided these councils with design and conservation advice for Development Control purposes.

Acting for private clients he provides help and advice to enable new development in historic locations and to make possible the alteration and extension of Listed Buildings.

As part of his work he supports contemporary architecture and provides advice and evidence for planning appeals at hearings and public enquiries . Robert provides conservation and design advice to support the work of architects and planning consultants so that new developments can have the best possible



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Site Assessment



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Location



Site Photography



P1.



P2.



P3.



P4.



P5.



P6.

Site Photography



P7.



P8.



P9.



P10.



P11.



P12.

Description



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Description

INTRODUCTION

The Bull is located within the Gosmore Conservation Area and comprises a Grade II Listed building which dates back to at least the 17th century. The List Description (NHLE Entry Number 1175112) for the property reads as follows:

House, now a public house. C17 or earlier, brick cased in early C18. Timber frame cased in plum brick with red dressings now painted on front and S part. Steep old red tile roofs. Low-pitched slate roof to E part of rear wing. A 2-storeys corner building facing W with single-storey rear service wing at SE. A 3-cells plan formerly roofed with cross-gable to parlour at S end, and a large projecting external chimney on E. Very large N gable chimney as open fireplace the full width of the house. Stair turret to rear of central part with front and rear doors. W front has plat-band, black painted plinth. 4 windows to 1st floor and 2 blocked openings. Segmental arches to the 3 windows on ground floor. Flush 2-lights casement windows with small-panes and external louvred shutters on ground floor. 8-panel door (renewed) in heavy frame up 2 steps. Wrought iron sign to RH end of front.

REVIEW OF HER RECORDS - 500 m RADIUS SEARCH

The earliest indication of human activity within the area is a find of a Palaeolithic Handaxe 39m north of The Bull (MHT386). Further prehistoric finds within the area were 2 flint arrowheads of Neolithic or Bronze Age date to the northeast of (MHT389) and a late Bronze Age sword (MHT4866). A possible Prehistoric barrow has been seen on LiDAR imaging 420m to the north-west of The Bull (MHT40382).

Whilst Roman activity is scarce within the search area some Roman pottery was found 138m northeast of The Bull (MHT396), and a feature in the garden of Gosmore End House (MHT317) has been suggested as a possible Roman burial mound. An undated bronze wire brooch (MHT 394) and an undated iron brooch

pin (MHT2291) were found in an adjacent field and it has been suggested they are contemporary with the mound.

No evidence for activity during the Anglo-Saxon period has been recorded within the search area, and the only Medieval feature noted is a late medieval timber framed farmhouse at Avenue Farm (MHT 15103). The Farmhouse itself is listed at Grade II* (NHLE entry 1102505, and there are two barns listed at Grade II (NHLE entry 162673). Neither the Bull nor any of the nearby Listed Buildings have individual HER records. Post medieval buildings and features that are recorded in the HER comprise the site of an 18th century windmill 474m north east of The Bull (MHT5975); timber farm buildings at Mill Farm, Mill Farm itself (MHT 15293) / (NHLE entry 162675 - Grade II); Thistley Farm (MHT 15102) / (NHLE entry 1295353 - Grade II, and The Byre NHLE entry 162689 - Grade II).

However, The Bull is located within the historic core of Gosmore and there are a number of Listed Buildings within the vicinity. For ease of reference those Listed Buildings within immediate proximity of the application site are illustrated on the map extract illustrated below.



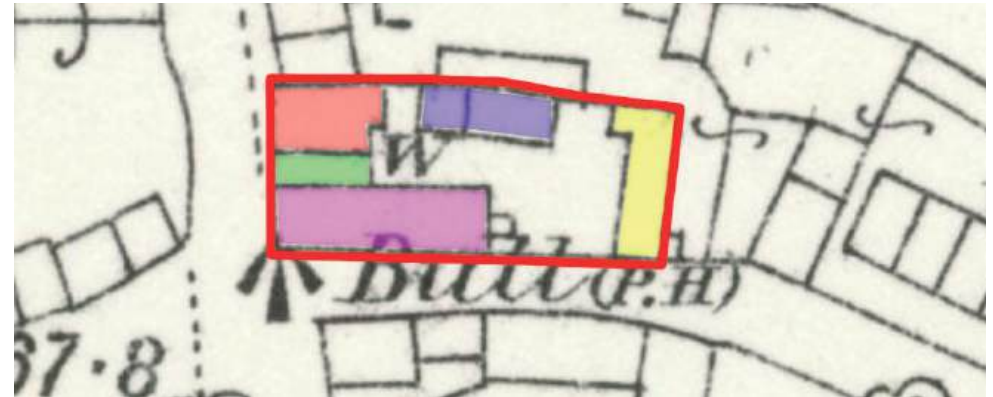
MAP EXTRACT SHOWING LISTED BUILDINGS (BLUE POINTS)

The development of the property and the village can be traced through map regression and large scale, albeit slightly indicative mapping is available from the 1834 OS survey and the 1847 Estate map for the village.



1834 OS EXTRACT

More detail is provided by the 1881 OS Survey and, interestingly, this suggests that at that time what is now a single property may then have comprised a number of separate buildings with a terrace of three buildings facing towards the high street and two substantial blocks of outbuildings within the rear.

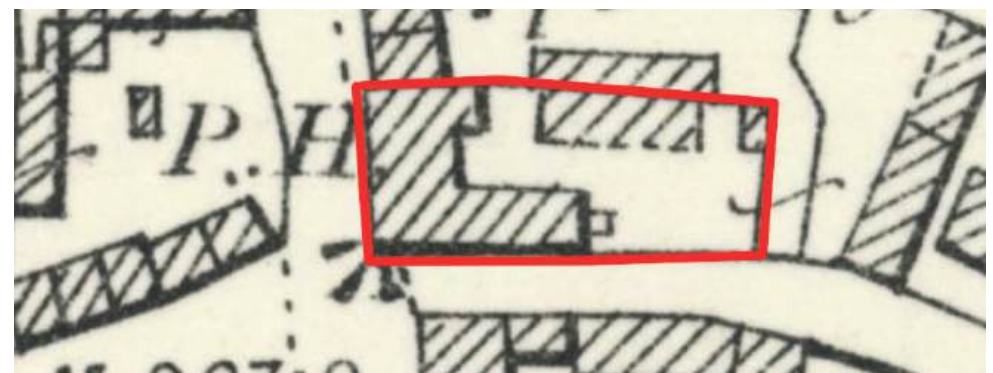


1881 OS SURVEY EXTRACT
SEPARATE BUILDINGS SHADED RED, GREEN, MAGENTA, BLUE & YELLOW

The form of the building group shown in the subsequent 1898 OS plan is very similar but indicates that the former easternmost outbuilding had been demolished.

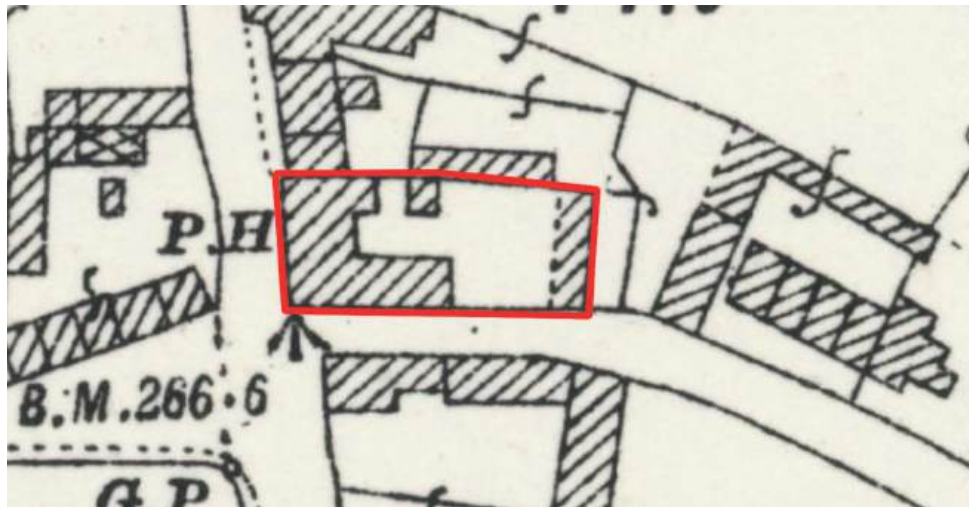


1847 ESTATE MAP



1898 OS EXTRACT

By the time of the 1924 OS Plan the form of the main building remained unchanged but it would appear that the outbuildings were again re-worked with construction of a new building along the eastern boundary and demolition of the former outbuilding which had previously stood on the northern side of the rear yard.



1924 OS EXTRACT

Visual inspection of the property makes clear that the building was heavily re-worked and extended over the post war period with works which included construction of substantial poor quality infill extensions at the rear of the main building.

By way of illustration, the attached overlay plan shows the modern day OS plan in red overlayed onto the 1881 OS mapping. Although it does seem that one earlier section of internal wall does survive from one of the northern outbuildings shown on the 1881 OS plan it is clear that the rear yard was substantially in-filled with a large rear extension over the course of the post war period. This area of 20th century infill extension is shown hatched magenta and clearly indicates the extent to which the form and footprint of the building was altered as a result of

postwar development.

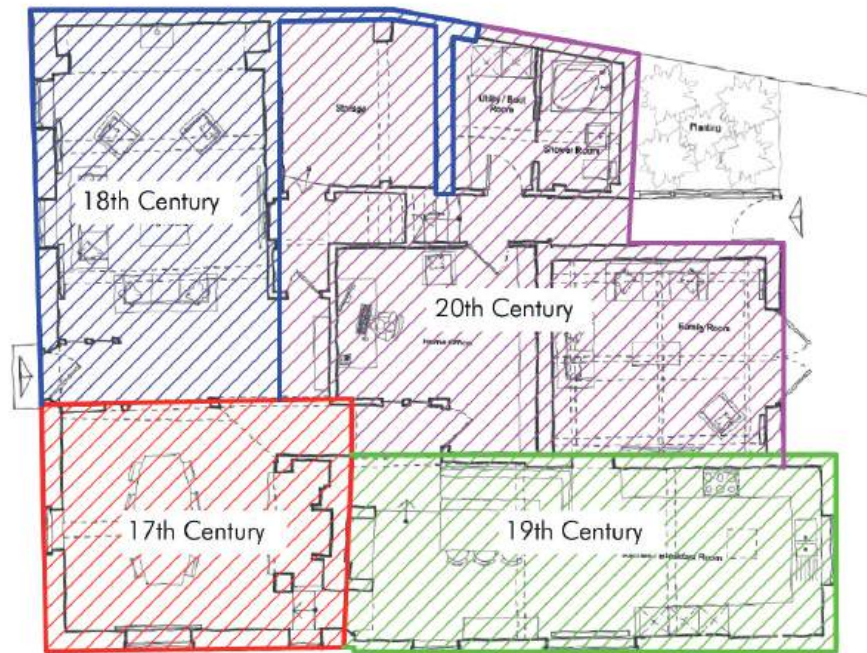
Interestingly the overlay also shows that the road junction to the south of the Bull has been widened out with buildings which once lined the southern side of the highway opposite the south flank of The Bull having been demolished and removed.

As a result, the setting of The Bull and the other nearby Listed Buildings within the village was significantly altered during the post war period.



OVERLAY PLAN OF 1881 OS MAP (Black) & CURRENT OS PLAN (RED)

From inspection of this historic mapping and the building fabric which can be seen on-site it is clear that the property evolved in at least four main phases and the broad layout of these different stages of alteration and extension is indicated in the outline phase plan illustrated below.



OUTLINE PHASE PLAN

Although it is possible that, when originally constructed, it formed part of a larger building structure the surviving elements of the original 17th Century historic core of the property are limited to the single bay timber frame section of the building located at the junction of the High Street and Waterdell Lane.

During the 18th century this timber frame building was encased with external brickwork and the building extended northward with a narrow span extension which fronts onto the High Street. This extension is of brickwork construction

with a steep clay tiled roof.

During the 19th century the building was further extended with a narrow span brickwork wing which extends along frontage to Waterdell Lane and which was constructed with a low pitch slate roof.

The main building appears to have survived in this form into the inter-war period but the property was then further reworked, re-developed and extended by infilling of the rear yard with an ad hoc aggregation of poor quality extensions with a mixture of pitched clay tile roofs, pitched slate roofs and low pitched profiled sheet roof coverings.

At the same time, the internal plan form of the building has changed and altered with probable insertion of a new staircase, construction of a first floor bedroom extension, construction of a half landing level bathroom with badly designed rear dormer and general opening up and reconfiguration of the ground floor plan. It is fair to say that 20th century extensions are of very poor quality, they have scarred the building and when viewed from the rear of the site they heavily compromise our ability to read, understand and experience the historic form and architectural character of the 17th and 18th century core of the Listed Building.



REAR ELEVATION DOMINATED BY POOR QUALITY POST WAR EXTENSIONS

It is also fair to say that the operation of a public house is a very intensive use for a Listed Building and the impact of this use over the course of the 20th century has been quite significant with opening up of the internal spaces within the building, the construction of service accommodation within the rear, the repeated removal and replacement of internal fixtures, fittings and internal finishes and large-scale loss of historic external joinery (window replacement etc.).

Over the course of the post war period it is also clear that the building was poorly maintained with poor quality repairs being executed using inappropriate and harmful materials, substantial loss and replacement of historic lime plaster internal finishes with modern gypsum plasters, cement render and plasterboard and in some cases a failure to maintain the building in a weather-tight condition which has resulted in water penetration, consequential decay of the building fabric and the collapse and loss of internal lath and plaster ceilings.



FAILURE OF LATH & PLASTER CEILING DUE TO WATER PENETRATION

As a result, the building which we can see and experience today is in a poor state of repair and is substantially different to what it would have been during the 19th century.

Unfortunately, changes in patterns of social behaviour and the wider economy mean that the viability of public houses has collapsed over the course of the last 50 years it is no longer viable for The Bull to operate as a public house within the village.

Indeed, conversion of the property and the alterations necessary for the building to function satisfactorily as a good quality dwelling is essential for the long-term survival and long-term conservation of this Heritage Asset.

As with the vast majority of Listed Buildings the long-term conservation of the building depends on it remaining in a productive and viable use which is capable of generating sufficient economic value to ensure that the building is well maintained so that it can survive for future generations to come.

In this regard, we should recognise that a building which is able to offer good quality accommodation and which is more highly valued by residents is one which is more likely to be well maintained so that it will survive in better condition over the coming centuries. As a result, sensibly managed alterations which allow the building to offer enhanced and better quality accommodation are of positive benefit for the long-term conservation of the Listed Building. We should also recognise that it is in the long-term best interests of a Listed Building that it should be allowed to evolve and change so that the accommodation which it provides is consistent with the expectation of residents as these change and evolve over time.

In order to work towards these objectives the current application therefore proposes an alternative and well balanced design for the residential conversion of the property which has been carefully crafted to enhance the quality of residential accommodation which the building can provide in a way which minimising adverse impact on those elements of the building which are of architectural and historic significance whilst at the same time providing a number of elements which are of clear positive benefit for the significance of this Heritage Asset.

National planning policy acknowledges the essential need to reduce carbon use in order to contribute towards mitigation of the climate change emergency

and recognises that properly managed alteration of Listed Buildings can make an important contribution towards this objective. As part of this current scheme of works the application does therefore propose sensible managed alterations which are intended to improve the thermal performance of and contribute to a reduction in carbon use.

DESCRIPTION OF PROPOSED WORKS

The application comprises what is effectively a comprehensive renovation and conversion of the former public house to form a good quality new dwelling.

On the ground floor the scheme envisages that the rear of the building which was previously altered and extended during the 20th century will be re-worked to form a new entrance hallway, service area and central kitchen dining room whilst the 19th century wing which runs alongside Waterdell Lane will be subdivided to form an office, bedroom suite and staircase up to new proposed first floor bedroom accommodation.

Within the historic core of the ground floor, the plan form will remain effectively unchanged except for a carefully designed scheme to restore the historic timber frame internal wall which separates the original 17th century section of the building from the 18th-century north wing which extends along the High Street frontage.

The current open plan bar will therefore be subdivided to form a living room and separate music room and the restoration of the timber frame separating wall to create these two spaces will serve to restore the condition of the original timber frame and will allow us to better understand the historic form of this part of the building.

At first floor and roof level it is proposed that the cluttered rear roofscape which has been created as a result of an aggregation of earlier poor quality 20th century development will be reworked and simplified by demolition of earlier 20th century extensions to allow creation of a simplified contemporary form. This will comprise two component elements with a low-profile contemporary flat roof extension to house the proposed rear hallway, powder room and dining room together with a simple pitched roof form above the proposed

kitchen area which will accommodate a new family bathroom, walk-in wardrobe and circulation space at first-floor level above.

At the same time, it is intended that the roof of the 19th century wing which runs alongside Waterdell Lane will be raised up into a stepped roof form to allow the creation of two new bedrooms, an en-suite shower room and a new rear staircase to provide a circulation route down to ground floor level.

The main body of the proposed contemporary rear extension and the new first floor pitched roof bathroom/service accommodation sit within the area of the building which was formed by 20th century extension and alteration so that this section of the proposal will not result in any material loss of older building fabric.

Similarly, the works within the ground floor of the 17th and 18th century core of the building follow the plan form of the original structure, will not result in loss of historic building fabric and will serve to re-establish and reinforce the original internal spatial form of this part of the property.

The alterations to the ground floor of the 19th century rear wing are generally additive resulting from the insertion of new partition walls and infilling of existing openings and experience suggests that the current, effectively open plan interior of this rear wing is unlikely to original and that the space was probably stripped out and opened up during the post war period. As part of this work, it would appear that a new concrete ground floor was laid. The floor tiles and concrete floor which can be seen within this part of the building appear to be of 20th century construction and the removal of these elements as part of the proposed re-working of the floor structure will not result in loss of historic building fabric.

However, it is acknowledged that the works to this wing will result in minor loss of 19th century brickwork where the new doorway for the proposed bedroom staircase will be formed to link into the new dining area. Some limited loss of 19th Century building fabric will also occur where the roof of the Waterdell Lane wing is lifted up to form the proposed additional bedroom accommodation. However, it is intended that this will be mitigated by retaining sound 19th century rafters and re-fitting these as part of the construction of the new raised

roof structure.

No alterations to the layout of the original first floor of the 17th century section of the building are proposed but a minor adaptation of the north end of the first floor of the 18th century wing is intended with re-positioning and re-configuration of the partition wall of original bedroom 3 to form an en-suite bathroom to serve the master bedroom.

Although the partition is likely to have been originally constructed in the 18th century, evidence suggests that, like much of the building, this element of fabric was heavily altered and adapted over the post war period. In this regard, photographic evidence suggests that, although some 18th century studs and some original timber laths survived, that significant sections of the original partition had been re-built in modern softwood and that original finishes had been lost and replaced with plasterboard.



PHOTOGRAPH OF PARTITION DURING OPENING UP WORKS

Within the area of the new en-suite bathroom a change is also proposed in that it is intended that the space should be opened up with a vaulted rather than flat ceiling.



FORMER BEDROOM 3 - NOW TO BE CONVERTED TO FORM EN-SUITE BATHROOM

It has become apparent that there have been extensive problems of roof leakage above this room which resulted in water penetration through the first floor ceiling. Indeed, the damp staining within the modern floor decking shown in the above photograph results from this roof leak and water working down through the building had also resulted in failure of the ground floor lath and plaster ceiling which is earlier illustrated in the photograph on page 14 of this statement.

As a result of this problem of roof leakage and general decay the original lath and plaster within the area of the now proposed en-suite bathroom had failed and inspection of the photograph above suggests that large sections of ceiling finishes within this room had been lost and replaced with modern plasterboard over the course of the post war period.

Nevertheless, it is acknowledged that the proposed works required to form the new en-suite bathroom and to form the proposed vaulted ceiling will result in some loss of historic building fabric consequent on the removal of earlier ceiling joists and loss of the residual surviving early elements of stud-work and timber lathing within the partition wall and ceiling construction.

Again however, it is intended that the loss of fabric arising from these works will be mitigated by re-use of sound surviving studs and ceiling joists by re-setting these timbers within the new ceiling and partition which will be created.

It is also acknowledged that the spatial character of the en-suite bathroom created by vaulting the ceiling to follow the roof pitch will be different to that of the earlier bedroom which featured a standard flat ceiling construction.

As later discussed, it is accepted that these elements of proposed work will result in some limited less than substantial harm to the significance of the building and that these elements of harm must be weighed up and balanced against those other elements of the scheme such as the restoration of the 17th century ground floor timber frame wall and improved architectural appearance of the rear elevation of the building which will be of clear positive benefit for the conservation of this Listed Building.

Parallel to the above proposed changes to the form and layout of accommodation within the building the application also proposes a scheme of repair works with repairs to the external roof coverings to ensure that the building is made weather-tight, repair of internal finishes where these have failed, replacement of 20th century concrete ground floors, replacement of poor quality 20th century external joinery and renewal of the inadequate and defective mechanical and electrical systems within the property.

It is intended that these repair works will follow the existing construction of the building with retained building fabric being repaired, and where necessary replaced, on a like for like basis.

In this regard, it is intended that surviving retained elements of historic lath and plaster wall and ceiling finishes will be repaired with new lime lath and plaster finishes but that existing plasterboard and modern gypsum plaster wall and

ceiling finishes will be repaired or over-boarded with new plasterboard and gypsum finishes.

Externally, the proposed scheme will result in material changes to the external architectural appearance of the building with construction of a new raised and stepped ridge line to the Waterdell Lane frontage and a much improved rear elevation which will be of positive benefit in allowing us read, understand and experience the historic form and appearance of the 17th and 18th century historic core of this Heritage Asset.

The final element of the application proposal is a scheme of works designed to improve the thermal performance of the building in order to significantly reduce carbon use in order to address the climate change emergency.

This will involve three main strands with the first element of this work involving the provision of additional breathable insulation within the roof and ceiling voids within the property.

The second element of this work will involve replacement of the majority of the existing external windows and doors with new double glazed joinery. In this regard, site inspection indicates that the vast majority of the existing external joinery was previously replaced over the course of the 20th century and it is self evident that the pattern of replacement joinery which was installed with widespread use of timber fan lights is inappropriate and harmful to the architectural character of the Listed Building.

In detailing this work the architect has carefully assessed the existing external joinery and those historic windows and window frames which have survived will be repaired and retained whilst lower quality 20th Century windows will be replaced with new timber side hung casements without inappropriate fanlights.

Finally, the scheme proposes that the external walls of the building will insulated with a new wall lining comprising timber battens with intermediate breathable insulation with a new internal plasterboard wall lining laid over a variable permeability vapour control layer.

Given the extent to which any original historic wall finishes have previously

been lost and replaced with post war cement render, plasterboard and gypsum plaster finishes it is very difficult to see how the proposed over-lining of the interior wall finishes will result in any harm to the architectural character of the building.

It is also clear that the architect has given considerable thought to the need to avoid the risk of interstitial condensation associated with the addition of internal solid wall insulation and the proposed detailing with the use of a variable permeability vapour control layer is a widely adopted strategy for the specification and detailing of thermal insulation of this type.

The architect as specified a “vapour open” form of insulation and this combined with the use of a variable permeability vapour control layer will allow moisture vapour to escape from within the wall construction.

As earlier discussed, The Bull is a Listed Building which has very significantly changed and evolved over time and the property which can be seen today is the product of a number of different phases of extension, alteration and re-development.

The application proposal will represent a new layer in the evolving development of the Listed Building and this carefully considered new phase in life of the Listed Building is wholly consistent with the history of a Heritage Asset which is characterised by a pattern of progressive evolution and change.

However, it is self evident that the works will affect the architectural and historic interest of the Listed Building and the impact of the proposal on the significance of this Heritage Statement is therefore considered in more detail within the following sections of this statement.

National Planning Policy Framework

The introduction of PPS 5 and the NPPF brought a material change in the tone of regulatory control, greater emphasis on the need to protect what is actually “special” rather than to simply “preserve as found” and greater recognition of the need to balance conservation objectives with the economic needs and social imperatives of our community.

The current revision of the National Planning Policy Framework was published in December 2024 and took immediate effect, superseding previous national planning policy.

Section 2 of the NPPF sets out a clear presumption in favour of sustainable development and paragraph 7 defines this as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

The NPPF makes it clear that one of the key dimensions of sustainability is protecting and enhancing the historic environment (paragraph 8).

Paragraph 3 of the NPPF makes it clear that the policy document must be read as a whole and the policies set out within the NPPF for the protection of the Historic Environment make it clear that the protection and conservation of Historic Assets must be weighed up and balanced against the governments other social and economic objectives. This means that development cannot simply be assumed to be “unsustainable” simply because it involves harm to, or even the demolition and loss of a heritage asset.

In fact, we cannot determine whether a development should be regarded as being “**sustainable**” or “**unsustainable**” without first going through the process of assessing the significance of any affected Heritage Assets, determining whether the proposal will cause harm to this significance and then a process of “weighing up” to determine whether any perceived harm to the historic built environment will be justified and outweighed by other social or economic benefits associated with any individual proposed scheme.

Where the significance of a Heritage Asset will be harmed there will be many cases where this cannot be justified and in these circumstances the development would then be considered to be “**unsustainable**” and should be refused. Indeed, Paragraph 202 makes clear that Heritage assets are an irreplaceable resource and Paragraph 212 emphasises the “**great weight**” which should be given to the conservation of a designated heritage asset. This is consistent with the basic legal requirement for a determining authority to have “**special regard**” to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they may possess. Similarly, it is consistent with the basic legal requirement to pay “**special attention**” to the desirability of preserving or enhancing the character or appearance of a designated Conservation Area.

These statutory obligations mean that when compared to other normal policy objectives much greater relative weight must be given to the need to conserve designated Heritage assets.

However, the NPPF includes no absolute presumption in favour of either conservation or preservation of a Heritage Asset and the tests set out in paragraphs 213, 214, 215 and 216 emphasise that harm to a Heritage Asset must be weighed up against the other public benefits which flow from a development proposal.

The omission of requirement for simple preservation “as found” and the adoption of a presumption in favour of sustainable development accords with Historic England’s principle of Constructive Conservation which explicitly acknowledges that the historic built environment is a dynamic and evolving place in which well considered new development can occur.

Similarly, in setting out the great weight which the government gives to the “Conservation” of heritage assets the NPPF confirms the change in approach introduced in PPS 5 which first introduced a structured definition of “Conservation” .

This definition is confirmed in the NPPF which states that for the purposes of heritage policy Conservation is :-

“The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate enhances its significance”.

The process of managed and properly considered change is therefore accepted as an inherent and essential part of the proper and responsible management of our shared heritage. Indeed, the approach taken first in PPS 5 and now the NPPF signals a substantial change in the philosophical approach to the way in which heritage assets are managed by our community.

By way of example paragraph 3.3 of PPG 15 simply stated that “..... there should be a general presumption in favour of the preservation of the listed buildings” and paragraph 3.4 went on to make it clear that the approval of applications for Listed Building Consent should be subject to justification of the proposal by the applicant who was required to show why any works which would affect the character of a Listed Building would be desirable or necessary.

In effect PPG 15 set out a simple presumption in favour of “preservation” of built heritage with statutorily protected buildings being effectively preserved “as found” unless an applicant was able to justify proposed alteration.

Clearly, the fundamental statutory duty to have special regard to the “desirability” of “preserving” a Listed Building, its setting and features of special interest or the character or appearance of a Conservation Area has not changed. However, the way in which we seek to achieve this objective has evolved and current national guidance opens up a much more positive approach to the management of heritage assets which emphasizes the preservation of what is actually special in our historic built environment.

This is part of a much more sophisticated approach to the management of built heritage which focuses much more clearly on the need to make a careful assessment of the actual nature, extent and relative level of the significance of individual heritage assets.

Most telling, was the original commentary in English Heritage’s (now Historic

England) introduction to Constructive Conservation which stated that :-

“ The Conservation Movement has evolved from a reactive process, focusing on preventing change, into a more flexible process of helping people to understand their historic environment and through that understanding, to manage change to it in the most appropriate way”

The fundamental point is that good conservation does not mean simply focusing on preventing change. Change is not harm and harm only results where change causes damage to what is actually “special” about the architectural or historic interest of the Heritage Asset concerned.

This change in philosophical approach was reflected in supporting guidance issued by Historic England and by way of example in its publication “Valuing Places: Good Practice In Conservation Areas” Historic England stated that :-

“This recognition of local distinctiveness is enshrined in legislation. It is not a device for preventing change or new development. Every conservation area contains places which have changed. Often these changes are features of the character which we wish to protect; often too, further changes have to be accommodated if we are to ensure such places have a viable and beneficial future.....”

It went on to state that :-

“ The care of our built inheritance has to be carefully balanced with the economic and social imperatives of the present”

This is consistent with the approach taken in the current NPPF which at paragraph 8 makes it clear that alongside its role in protecting and enhancing the environment (including the historic environment) the planning system has two other key roles which are the need to contribute to building a strong, responsive and competitive economy and its social role in providing badly needed housing and fostering a well-designed and safe built environment with accessible services and open spaces.

National policy guidance therefore indicates that the positive economic and

social benefits of new development must be given material weight and that this must be weighed up and balanced against harm caused to the historic built environment.

This approach does not imply any “green light” for unnecessary, inappropriate or ill considered harm to the historic environment and in Paragraph 213 the NPPF states that any harm or loss to a designated heritage asset must be clearly and convincingly justified.

In this regard it also makes it clear that the principle of proportionality is fundamental to the decision making process so that the level of justification which is required depends on the relative significance of the designated Heritage Asset concerned.

As part of this structured approach the NPPF builds on the principles set out in PPS5 and confirms the concept of “Harm” and “Substantial Harm” as two different levels of adverse impact on the significance of a Designated Heritage Asset.

Paragraph 214 of the NPPF relates to the consideration of applications that will result in ‘substantial harm to’ or ‘total loss of significance’ of designated heritage assets and makes it clear that permission for such development should be refused unless the harm caused is outweighed by the public benefit of the proposal or unless it is essential for the long term viability of the asset concerned.

Paragraph 215 relates to proposals that will result in ‘less than substantial harm’ to the significance of a designated heritage asset, stating that this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In considering the level of public benefit which is required to justify development which results in “less than substantial harm” it is necessary to refer back to the principles of proportionality set out in Paragraph 206 which states that “Substantial Harm” to Grade II Listed Building, park or garden should be “exceptional” whilst “Substantial Harm” to a heritage asset of the highest significance should be “wholly exceptional”.

It is worth stopping to think about the wording of this guidance and worth noting that the need for “exceptional” justification in relation to Grade II designated assets is only intended to apply to development which would result in substantial

harm. By definition this choice of wording indicates that the level of justification required for works which result in less than substantial harm to a Grade II designated asset would not be exceptional. In other words it is not unusual or out of the ordinary for there to be sufficient public benefit to justify works which result in less than substantial harm to Grade II Listed Buildings or Grade II registered parks and gardens.

Finally, the NPPF provides separate guidance in paragraph 216 regarding development which affects designated assets. In this regard the policy simply states that the effect of the application on the significance of the asset should be taken into account and that in weighing up such applications a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the asset.

Whilst paragraphs 213, 214, 215 and 216 provide a methodology for assessing harm it must be recognised that in practice it is quite rare for the impact of works to be either wholly positive or wholly negative for the significance of heritage assets.

Some aspects of a development may cause harm to the significance of an asset whilst other aspects of the same scheme may result in positive benefit and in such cases the net impact of the proposal on the significance of the asset must be considered and weighed up as part of the process of determination.

The determination of an application therefore requires us to do more than simply refuse consent for any application which includes any element of perceived harm and we need instead to balance and weigh-up the different elements of harm and different elements of positive benefit to the significance of the asset so as to reach a balanced judgement as to whether the scheme as a whole will, or will not result in net harm to the significance of the Heritage Asset concerned.

Similarly, there are instances of development which result in physical change to a heritage asset but whose impact on the special architectural or historic interest of the asset is entirely neutral.

In this regard an obvious example is the precedent established in *South Lakeland DC v Secretary of State* (1991) 2 P.L.R 97.

This case concerned the decision of an inspector to allow an appeal for construction of a new building within a Conservation Area on the basis that it would neither harm nor enhance the area (largely because it was to be constructed in a location where it would only be visible from very limited view points). Following judgement in the House of Lords this case established the principle that the preservation of the character or appearance of a Conservation Area could be achieved by development which left it unharmed.

Whilst this case related specifically to a Conservation Area it is self evident that similar principles can be applied to the consideration of proposals which affect other Heritage Assets such as Listed Buildings.

Finally, in applying the guidance set out in the NPPF it is also important to remember that it cannot override the requirements of primary legislation and that the Courts are the final arbiters of what this legislation actually means.

Methodology of Impact Assessment



WARD-BOOTH
PARTNERSHIP

Methodology of Impact Assessment

The NPPF makes clear that development management should be based on an evidence based assessment of the significance of individual Heritage assets which may be affected by the relevant development proposal. Understanding the relative significance of affected assets is vital to a successful development scheme and in this regard the NPPF reflects the earlier English Heritage (now Historic England) publication of Conservation Principles Policies and Guidance.

Given the diversity and richness of our shared heritage the assessment of significance for individual assets can be a difficult and sometimes subjective process. However this latter English Heritage Guidance sets out a structured approach based first on consideration of a range of Heritage Values encompassing the evidential, historic, aesthetic and communal values associated with each individual place.

Evidential value is defined as value derived from the potential of the place to yield evidence about past human activity whilst Historic Value is that which is derived from the ways in which passed people, events and aspects of life can be connected through the place to the present day. In this regard, the guidance suggests that Historic Value will normally be either illustrative or associative in nature. Aesthetic value is defined as the value which flows from the way in which people draw sensory and intellectual stimulation from a place whilst Communal Value derives from the meaning of the place for the people who relate to it or for whom it figures in their collective experience or memory

The guidance goes on to set out a systematic process for the assessment of significance.

Although not all steps will be applicable to all places the guidance emphasises the following key stages :-

- 1 - Understand the fabric and evolution of the place.
- 2 - Identify who values the place and why they do so
- 3 - Relate identified heritage values to the fabric of the place.

- 4 - Consider the relative importance of those identified values.
- 5 - Consider the contribution of associated objects and collections.
- 6 - Consider the contribution made by setting and context.
- 7 - Compare the place with other places sharing similar values.

This approach, set out within Conservation Principles Policies and Guidance needs to be applied in conjunction with the guidance provided in Paragraph: 006 (Reference ID: 18a-006-20190723) of the Planning Practice Guide which Provides an overarching definition of Significance and explains how consideration of heritage interest should be approached.

‘Significance’ in terms of heritage-related planning policy is defined in the Glossary of the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

The National Planning Policy Framework definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic. This can be interpreted as follows:

- ***archaeological interest: As defined in the Glossary to the National Planning Policy Framework, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.***
- ***architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction,***

craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.

- **historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation's history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.**

In undertaking this assessment in relation to the current application scheme it is also particularly important have regard to national guidance in relation to the consideration of the setting of Heritage Assets.

In this regard, the NPPF glossary defines the setting of a Heritage as follows:

“The surroundings in which a Heritage asset is experienced. Its extent is not fixed may change of the asset and its surroundings evolve stop elements of the setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral”

The starting point for consideration of the setting of a Heritage Asset is set out in Paragraph: 013 (Reference ID: 18a-013-20190723) of the PPG which states that:

“All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset

in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

More detailed advice about how this guidance should be applied is then set out within Historic England Historic Environment Good Practice Advice in Planning Note 3 (Second Edition).

In summary, National Guidance makes clear that the setting of a Heritage Asset should be considered in an extensive way which encompasses the whole of the way in which the asset is experienced. The contribution that setting makes to the significance of a Heritage Asset does not depend on there being public rights of access or an ability to experience that setting and the concept of setting amounts to more than simple inter-visibility and should have regard to environmental conditions (noise and vibration etc.) and any historic relationship between the application site and the Heritage Asset concerned.

Indeed, Historic England highlight examples of cases where the setting of a Heritage Asset has been affected even where there is no inter-visibility whatsoever between the Heritage Asset and the development concerned.

Assessment of Significance, Impact and Harm



Assessment of Significance, Impact and Harm

IDENTIFICATION OF HERITAGE ASSETS AFFECTED BY PROPOSED DEVELOPMENT

Clearly, The Bull will be directly affected by the proposed works which will have an impact on the significance of this Grade II Listed Building.

The property also forms part of the Gosmore Conservation Area and as the proposal will result in changes to the external appearance of The Bull it will also affect the character and appearance of this designated Heritage Asset.

Within the locality of the property there are a number of other Listed Buildings and it is self evident that the proposal will result in changes to the wider setting of these Heritage Assets.

ASSESSMENT OF SIGNIFICANCE, IMPACT & HARM

THE BULL

By definition, The Bull is a Grade II Listed Building which is of special architectural and historic interest and which is acknowledged to be of national significance.

However, this is not a building which is of more than special or exceptional significance and it is not of such high value as to preclude well considered and properly managed alteration and change.

In visual terms this is an attractive building which has self-evident aesthetic value and as a result of the age of the property the historic building fabric within the structure is of historic interest.

The building also has evidential and historic value as a built record of historic

patterns of vernacular design and craft practice and, as a former public house, evidential, historic and communal value as a surviving physical link to the social history of the village.

The application proposal will involve a significant package of works which will result in change to the building structure and visual change resulting from the proposed extensions, replacement of 20th century external joinery and internal works such as alterations to the proposed first floor en-suite and restoration of the timber frame ground floor wall which separates the original 17th century section of the building from the 18th Century North wing.

As is quite typical for a project of this type the various different elements of the scheme will have different levels of impact on the significance of the Listed Building with some works being of clear positive benefit, some limited elements of work resulting in less than substantial harm and many elements of work which will be of effectively neutral impact.

However, the fact that the proposal will result in physical and visual change and some does not necessarily mean that it will result in harm to the overall significance of the Listed Building. Even where there are some individual elements of work which might result in perceived harm it is perfectly normal for individual elements perceived harm of this type to be more than balanced out outweighed by other positive aspects of the scheme which are clear benefit for the long-term conservation of the Heritage Asset.

Consideration of the application therefore requires us to weigh up of these different elements of the scheme and come to a balanced view as to the overall net impact of the proposal on the significance of the Listed building as a Heritage Asset.

In this regard, it is acknowledged that there are a small number of elements within application proposal which will result in limited less than substantial harm to the significance of the property.

Examples in this regard include the limited loss of older building fabric which will result from the repositioning of the first floor en-suite bathroom wall, the removal of brickwork required to form a new doorway at the eastern end of the 19th century Waterdell Lane wing and the raising up of the roof of this wing to create a new slightly raised ridge line.

Similarly, some limited less than substantial harm will result from the change in internal spatial character arising from the proposal for the originally flat ceiling within the first floor en-suite bathroom to be replaced with a vaulted ceiling form which will follow the roof slope above.

However, within the context of the significance of the Listed Building as a whole the impact of these elements of less than substantial harm is a genuinely quite limited and heavily mitigated by the particular circumstances of this case.

By way of example, it is intended that existing sound rafters from within the current roof of the Waterdell Lane wing will be retained and reset within the new raised roof form so that any loss of old building fabric can be mitigated and reduced.

Similarly, although it is acknowledged that the repositioning of the first floor en-suite bathroom partition and alteration of the first floor en-suite bathroom ceiling will result in some loss of small elements of 18th-century building fabric any perceived harm is mitigated by the reality that original lime plaster finishes have very largely been lost and that there is clear evidence that the original timber partition was heavily reworked and rebuilt with modern softwood timbers during the course of the 20th century.

Whilst acknowledging that the building fabric which forms part of the 19th century Waterdell Lane wing is of some age and does therefore have some historic value it is also important to point out that such 19th century building fabric is of much lower value than that from the original 17th-century core of the Listed Building and that within the context of the historic built environment there is nothing particularly rare or special about elements building fabric such as Victorian brickwork or sawn rafters from the Victorian period.

It is also clear that this is a case where a substantial proportion of the proposed

works will be of effectively neutral impact and that whilst these elements of work will result in physical and visual change they will not result in material harm to the long-term conservation and significance of the Listed Building.

Examples in this regard include like for like repair works, works such as the demolition and replacement of 20th-century building fabric and, in the context of the extent and pre-existing impact of earlier 20th century alterations, works such as the proposal for internal insulation to enhance the thermal performance of the external walls of the building.

My own view is that the impact of the proposed re-working of the roof line of the 19th century Waterdell Lane elevation also falls into this category of neutral impact.

Whilst the current roof form is existing and is part of the current form of the building the reality is that The Bull was not Listed because of the architectural value of this existing roof form and the existing roof forms part of a later extension rather than the much more significant 17th and 18th century historic core of the property.

Furthermore, I am satisfied that the visual appearance of the new roof will blend and harmonise with the architectural character of the original core of the building to create a pleasant and harmonious visual composition.

Whilst these works will result in visual change their impact on the architectural special interest of the building will be neutral and in this regard the proposed works will not cause harm to the actual significance of this Heritage Asset.

Along side these limited elements of less than substantial harm and those elements which will have neutral impact it is also clear that the scheme also includes important elements of work which will be of clear positive benefit for the significance and long-term conservation of the Listed Building.

At the rear of the property, the existing clutter of poor quality extensions does harm the architectural special interest of the Listed Building, causes harm to the aesthetic value of the property and damages our ability to read, understand and experience the architectural form of the 17th and 18th century historic core

of the building.

The application includes a carefully considered scheme for demolition and replacement of the existing 20th century rear extensions with a simplified low profile form which will be of clear positive benefit in better revealing the form of the 17th and 18th century historic or of the building and which will provide enhancement of the aesthetic value of this Heritage Asset.

The scheme will also be of positive visual benefit in allowing the existing poor quality post-war fanlight windows within the building to be removed and replaced with better quality and more appropriate traditional casement units. This will provide a clear enhancement to the visual quality of the building along the High Street and Waterdell Lane frontages.

Importantly, the scheme provides for restoration of the timber frame internal wall which separates the historic 17th and 18th century sections of the building. The current open plan bar will therefore be subdivided to form a living room and separate music room and the restoration of the timber frame separating wall to create these two spaces will serve to restore the original timber frame and will allow us to better understand the historic form of this part of the building.

The scheme also provides for a comprehensive package of repair works which are now essential in order to bring the building back into a good state of repair, to ensure that the building is weather-tight and to resolve the problems of water penetration and consequential decay which have caused significant damage to the internal fabric and finishes of the property.

More fundamentally, the revised application scheme provides for the conversion of the building from its earlier use as a Public House into a new economically viable use as a residential dwelling.

The first fundamental objective for the conservation of Heritage Assets of this type is the need for the asset to be maintained in a sustainable and viable use which will generate sufficient economic value to allow the building to be maintained so that it can survive for future generations to come.

Unfortunately, the earlier use of the building as a Public House has become un-viable and the impact of declining viability of this use can be seen in the progressive failure to properly maintain the property and consequential problems of water penetration and decay which are now having to be resolved and made good.

In providing for conversion of this former public house into an economically viable residential dwelling the application scheme should be acknowledged as being of positive benefit for the long-term significance of this Heritage Asset.

In ensuring the future conservation of the property it is also important to recognise that the long-term survival and the quality of long-term maintenance of the building fabric will be more secure if the property is adapted to provide good quality residential accommodation, if the accommodation which the property can provide is allowed to evolve to meet the expectations of successive generations building owners and if the quality of accommodation the within the dwelling ensures that the building is highly valued by building owners.

We should recognise that the application scheme is specifically designed to improve and enhance the quality of residential accommodation which the building is able to provide and we must therefore recognise that this is of clear positive benefit for the long-term conservation of the Listed Building.

In considering the application proposal it is also worth reflecting on our philosophical approach to the management of Listed Buildings, to acknowledge that building conservation is not a zero-sum game, to think about the way in which Heritage Assets are allowed to evolve and to recognise that application proposals which will result in some elements of harm to the perceived significance of the property may nevertheless provide something new which can add in a positive way to the long-term value of the Heritage Asset for our society.

In thinking about these issues is worth taking time to step back and look at the way in which many of the older historic buildings which we value and cherish have developed over time and the reality that very many of these buildings result from successive phases of extension, alteration and redevelopment which have, in the short term, resulted in change and loss but which have, in the longer term, resulted in the creation of better buildings which enrich the built

environment and the quality of our lives.

To take an example from history, the photograph below shows the northern elevation of the chapel in the Gonville Court within Gonville and Caius College in Cambridge.

This is a wonderful Grade I Listed building of the very highest level of architectural and historic interest which sits at the heart of the Old Courts complex in the centre of the city.



GONVILLE AND CAIUS CHAPEL

However, the fact is that this 18th-century façade is not original and does instead result from very substantial reworking of the earlier mediaeval chapel which was erected when the college was first established. As part of this 18th century phase of redevelopment which created Gonville Court the façade illustrated in the above photograph the original mediaeval chapel was completely re-faced, a new parapet was added and the roof was truncated and reduced in

height in order to achieve a uniformity of visual appearance around the courtyard which was created.

In order to achieve the necessary reduction in the height of the chapel roof line the scheme of works involved the truncation of the original medieval scissor truss roof structure, construction of a new section of lead flat roof, very substantial loss of historic building fabric and very substantial harm to the architectural integrity of the original chapel building.

At the time that these works were undertaken the medieval chapel was already more than 400 years old and, if the 18th-century had our modern day system of planning control, it is entirely possible that concern would have been expressed about the loss of historic building fabric involved and the very substantial alteration to the character and appearance of what was already a very old historic building.

The philosophical question to consider is whether the world would be a better place, if at that time, it had been decided that the proposed creation of the 18th-century courtyard would have been harmful to the then historic built environment and that the then proposed scheme of works should not have been allowed to have been constructed.

The medieval chapel would have survived in its original form and this in itself would have been a significant building of very great architectural and historic interest. However, the 18th-century courtyard which is seen and experienced today would never have been built, the aesthetic, architectural and historic interest of this phase of development would have been lost and our shared built heritage would be diminished in this regard.

If the form of the chapel had been fixed in place in the 18th century the college buildings which we experience today would be different but would still be of high value. However, it seems very difficult to accept that the decision to allow the chapel to evolve has actually resulted in any material harm to the historic built environment and my own view is that the decision to allow this high quality phase of new development has added very significantly to the quality and richness of our experience of this exceptionally significant Heritage Asset.

In the context of this current application it is also important to recognise that The Bull is itself a property which is characterised by a series of different phases of alteration, extension and reworking.

When seen in this light the determining issue is not whether individual elements of the proposed work will result in perceived harm and loss but is instead whether the proposed new works are of sufficient quality to ensure that this proposed scheme of works will come to be seen as a new phase in the evolution of the property which adds in a positive way to the long term architectural and historic interest of the Listed Building as it evolves through time.

To put this into the context of the detailed assessment of the current application it is acknowledged that removal of the existing flat ceiling within the first floor en-suite bathroom to create a vaulted ceiling form will result in spatial change and some loss of older building fabric and therefore some perceived harm to the Listed Building.

However, we should be open to the reality that vaulting the ceiling will create a wonderful and exciting space and that over time, this new ceiling form will come to be seen as simply a new phase in the development and evolution of the property which will add in a positive way to the long-term value of the Listed Building for our society.

Given the above comments it is clear that assessment of the current application does require a balanced judgement which weighs up those elements of the scheme which will result in limited less than substantial harm against those other elements of the proposal which will be of clear positive benefit for the long-term conservation of the Heritage Asset.

When seen in the round and properly considered and weighed up my view is that this is a sensible scheme which strikes a good balance between the need to preserve and the need to allow the building to evolve and which will serve to secure a viable long-term future for this Heritage Asset.

On balance I therefore find that the application proposal will be of net positive benefit for the long-term significance and conservation of the Listed Building.

GOSMORE CONSERVATION AREA & SETTING OF NEARBY LISTED BUILDINGS

The Bull is located within the designated area of the Gosmore Conservation Area and therefore forms part of this designated Heritage Asset.

As earlier noted, there are also a number of other Listed Buildings within the vicinity of the application site and, given the prominent location of The Bull within the centre of the village, it is clear that the property should be regarded as forming part of the setting of these nearby Heritage Assets.

By definition, the Conservation Area is acknowledged to be an area of special architectural and historic interest and the statement of special interest set out within the Council Conservation Area Character Statement suggests that the significance of this Heritage Asset is primarily derived from the visual composition of green spaces, landscape planting and historic buildings within the core of the village together with a number of specific identified views within the settlement.

It is self-evident that the application proposal will result in physical and visual change to the Conservation Area and that it will also result in change to the setting of other nearby Listed Buildings.

However, the fact that the proposal will result in change does not mean that it will cause harm to the actual significance of these Heritage Assets.

In this regard, I am satisfied that the proposed alterations which will be visible along the Waterdell Lane frontage and the proposed re-working of the Waterdell Lane wing will blend and harmonise satisfactorily with the visual character of the street scene and that these changes will not cause harm to the character and appearance of the Conservation Area.

It is also clear that the proposed replacement of inappropriate post-war fanlight windows will also be of positive benefit for the High Street and Waterdell Lane frontages of the building and the important view identified within the Council Conservation Area Statement which runs northward along the High Street from

the junction with Waterdell Lane.

When considered and weighed up, I am satisfied that the application proposal can be accepted without any material harm to the overall significance of the Conservation Area and the setting of nearby Listed Buildings.

JUSTIFICATION

The application proposes a balanced package of works which will be of net positive benefit for the significance of the Listed Building and which will not result in any harm to the significance of the Gosmore Conservation Area nor the setting of the other Listed Buildings and Heritage Assets within the village.

However, should the Local Planning Authority conclude that the proposal will result in some limited less than substantial harm to the significance of these Heritage Asset then any such less than substantial harm will need to be weighed up and balanced against the public benefits of the scheme.

Without wishing to over state the case is apparent that the application proposal is of public benefit and I would comment as follows:

A significant element within the proposed scheme of works will involve the installation of insulation through a combination of works including insulation of external walls, the provision of appropriate slim light double glazing and the provision of additional loft insulation.

These works will dramatically improve the thermal performance of the building, will significantly reduce carbon use and will contribute in a positive manner towards the battle against climate change.

Whilst acknowledging that the proposals for extension of the building are brought forward, in the first instance, for the benefit of the applicant it should be recognised that these works represent a long-term investment and enhancement of our shared built environment.

These proposed alterations will materially improve the quality of accommoda-

tion which the building is able to provide which will be of clear positive benefit for successive generations of building owners.

Finally, the scheme will contribute to government objectives for the encouragement of building activity and economic growth and will serve to contribute towards the preservation of the traditional building skills which are required in order to ensure the long-term conservation of Listed Buildings of this type.

The application proposal will result in public benefit, it is justified in accordance with NPPF requirements and the proposed scheme of works should be accepted as being of net positive benefit for the historic built environment.

I would commend the application to the Council and would respectfully request that planning permission and Listed Building Consent should be granted.